

Ariel Reinitz

From: Ariel Reinitz
Sent: Tuesday, June 1, 2021 9:17 PM
To: Adam Engel
Subject: FW: [External Sender]Activity in Case 1:20-cv-01609-AJN-GWG GateGuard, Inc. v. Goldmont Realty Corp. et al. Letter
Attachments: [Request to 'meet and confer' re: enforcement of subpoenas to Samuel Taub] (GateGuard v. Goldmont, et al.; SDNY 1:20-cv-01609-AJN-GWG)
Importance: High

Hi (again) Adam – your letter (filed this evening) admits you did not confer with me prior to seeking relief from the Court, in violation of Section 2.A. of [Judge Gorenstein's Rules](#). You also notably omit the fact that I contacted you earlier today *requesting to meet and confer on this issue* (see attached).

That you and I conferred weeks ago in another case – *before* these subpoenas were issued – changes nothing re: the requirement to meet and confer *in this case*. Invoking my recent conference with counsel *for another party*, during which the third-party subpoenas and any purported motion to quash them was *never* discussed (an issue I have separately raised with Mr. Schonfeld) – also does not exempt you from complying with the Court's pre-motion requirements.

Please withdraw your letter and, per my email of earlier today (attached) advise as to your availability to meet and confer re: Plaintiff's anticipated motions to enforce the subpoenas to Mr. Taub, Mr. Soleimani, and ABJ, and any other issues you wish to discuss.

Thanks,
Ariel

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U.S. District Court

Southern District of New York

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Case Name: GateGuard, Inc. v. Goldmont Realty Corp. et al.

Case Number: [1:20-cv-01609-AJN-GWG](#)

Filer: Joseph Soleimani
ABJ Properties, Inc.
Samuel Taub

Document Number: [49](#)

Docket Text:

THIRD PARTY LETTER addressed to Magistrate Judge Gabriel W. Gorenstein from Adam Engel dated June 1, 2021 re: Quashing Plaintiff's Third-Party Subpoenas. Document filed by Joseph Soleimani, ABJ Properties, Inc., Samuel Taub. (Attachments: # (1) Exhibit A-H).(Engel, Adam)

1:20-cv-01609-AJN-GWG Notice has been electronically mailed to:

Ariel Reinitz ariel.reinitz@fisherbroyles.com

Jacob Schindelheim ajs@kandsllp.com

Shira Moyal shira@kandsllp.com

Simcha David Schonfeld sds@kandsllp.com

1:20-cv-01609-AJN-GWG Notice has been delivered by other means to:

ABJ Properties, Inc.

Joseph Soleimani

Samuel Taub

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=6/1/2021] [FileNumber=25979285-0

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068d1aeb740602d6b7df2324e87fbaf5ffa52d66a57fd3981181a7d4c0a1c]]

Document description:Exhibit A-H

Original filename:n/a

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[STAMP dcecfStamp_ID=1008691343 [Date=6/1/2021] [FileNumber=25979285-1

] [13e63534097cd4f720ecc84a32bfc03c6ebfbe7b333ed76aab5d14bab1576cfb91
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